



September 10, 2004

Mr. Nabil S. Fayoumi
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
Monthly Report August 1 – August 31, 2004**

Dear Mr. Fayoumi,

Enclosed is the Sauget Sites Area I Monthly Report for the August 2004 reporting period. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven D. Smith", is written over a horizontal line.

Steven D. Smith
Project Coordinator

cc: Kevin Turner – USEPA
Tim Gouger - USACE
Sandra Bron - IEPA
Dave Webb - IDPH
Mike Coffey - USF&W
Richard Williams - Solutia
Cathleen Bumb - Solutia
Mayor Frank Bergman - Cahokia, IL
Village of Sauget - c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor R. Sauget - Sauget, IL
L. Glen Kurowski - Monsanto

EPA Region 5 Records Ctr.



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Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Status Report

Date of Report: September 10, 2004
Period Covered: August 1, 2004 - August 31, 2004

Work Performed during the Reporting Period

Borrow Pit Lake

No work was performed on the Borrow Pit Lake during the reporting period.

Dead Creek

No work was performed during the reporting period.

DNAPL Investigation

The final DNAPL Investigation Work Plan was submitted to the Agencies on April 20, 2004. The schedule for completion of the study, originally set for June 23, 2004, was revised to December 17, 2004. Due to the additional requirement for the preparation of a "Summary Report with Proposed Locations for Soil Borings / Piezometers", and review and approval of this document, the current schedule for completion is now forecasted for January 21, 2005.

Field work began on Task 2 of the Work Plan on May 10, 2004. This task required the surveying of approximately 57 existing wells for the presence of NAPL and, if detected, the sampling of any such material. Of the original 57 wells designated for inspection and survey, 54 were found to be usable. One well had been destroyed and two wells were damaged to the extent that down-hole tools could not be used in the wells. The well survey was completed on May 20, 2004.

Non-aqueous phase liquids were detected in three of the 54 wells. One of these wells contained recoverable amounts of LNAPL and a sample of the material was obtained for physical characterization and chemical testing. The other two wells, both bedrock installations, contained some evidence of the presence of DNAPL, although neither well contained recoverable quantities.

Field activities for Task 3, the seismic reflection survey, began on June 7th and were completed on June 30th. Limited clearing operations at Site G along the pathways of the seismic survey grid were necessary because the site is heavily vegetated. The clearing operations were conducted between June 24 and June 26. During the work, the contractor encountered two very small areas with surficial waste materials and reported this finding to Solutia. Solutia representatives inspected the areas and discussed the findings with the Agency. It was agreed that the waste materials would be sampled and that a temporary cover would be placed over the areas. Samples were obtained on July 1st and the unvalidated results of the laboratory analyses of these samples were reported to the Agency on July 29th. Validated results were submitted on August 11, 2004. The temporary covers were constructed on July 7th and July 8th. Both covers consist of a synthetic membrane covered by approximately one foot of clean soil.

The field notes from an investigation carried out in 1999 that were used by the Corps of Engineers (COE) to construct a table showing widespread DNAPL throughout the area were reviewed as part of the evaluation of the historical data on the possible occurrence of DNAPL in Area 1. A report summarizing the results of that review was submitted to the Agency on August 6th. The major conclusion in the report was that the only credible evidence of the occurrence of NAPL in Area 1 at that time was in well EE-11 on Site G. This conclusion was confirmed during Task 2 of the present investigation.

As report summarizing the results of the existing well survey and the preliminary results of the geophysical survey was submitted to the EPA on August 13, 2004. Based on the preliminary interpretation of the bedrock topography from the seismic investigation data, the report also included proposed locations for 18 new wells to be installed during Task 4 of the investigation. Some of these proposed locations were revised on August 23rd in response to minor changes in the interpretation of the bedrock surface topography. A meeting was held with the Agency on August 24th to discuss the proposed well locations and as a result of discussion during the meeting, three of the locations were changed. One of these is inside the Cerro Flow Products (Cerro) manufacturing facility and the final location will have to be selected in consultation with Cerro to avoid interfering with planned new construction. Once the location is finalized with Cerro, a new location map will be submitted to EPA for approval. At the end of the meeting, the Agency gave verbal approval to begin well installation. Formal approval will be contained in a letter to be issued by EPA in the near future. That letter will also contain Agency comments on the summary report.

Attachments

There are no Technical Memoranda or data submitted with this report.

Work Scheduled for Next Reporting Period

- Submit the results of the analyses performed on the LNAPL sample recovered from well EE-11.
- Begin installation of new monitoring wells (Task 4 of Work Plan).

Submittal Schedule Status

The only submittals envisaged during the next reporting period are the revised location map for the new DNAPL investigation wells and the results of the analyses on the LNAPL sample recovered from well EE-11 on Site G.